

AUG 06 2020

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

PETER A. MOORE, JR., CLERK  
US DISTRICT COURT, EDNC  
BY CPB DEP CLK

NO. 5:20-CR-377-1M

UNITED STATES OF AMERICA	)	
	)	
v.	)	MOTION TO SEAL
	)	
JESSE JAMES FREEMAN	)	

The United States of America, by and through the United States Attorney for the Eastern District of North Carolina, hereby moves this Honorable Court for an Order sealing the Criminal Information, Plea Agreement, Calendar Memo, Penalty Sheet, Notice of Related Cases, any prior docket entries, this Motion to Seal, as well as the Order to Seal, and any subsequent filings in the above-referenced matter, and in support thereof, shows unto the Court as follows:

The Defendant has provided and continues to provide information in connection with an on-going federal investigation in the Eastern District of North Carolina and elsewhere. Based upon information provided by the Defendant, the Government believes that there may be other viable targets for prosecution associated with this case. Disclosure of the above-referenced documents may alert potential targets of the existence, scope, and details of the investigation and, therefore, would pose a risk of destruction of additional evidence and otherwise compromise the investigation. *See Baltimore Sun Co. v. Goetz*, 886 F.2d 60 (4th Cir. 1989).

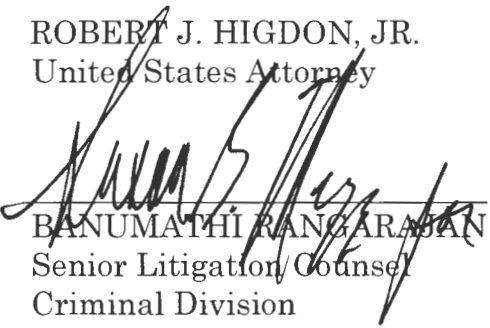
WHEREFORE, the Government moves for an Order sealing the Criminal

Information, Plea Agreement, Calendar Memo, Penalty Sheet, Notice of Related Cases, any prior docket entries, this Motion to Seal, as well as the Order to Seal, and any subsequent filings in the above-referenced matter until further Order by this Court, except that a certified copy of the order be provided to the Office of the United States Attorney, and that such office be authorized to provide a copy of the order to counsel for the Defendant.

Respectfully submitted this 6th day of August, 2020.

ROBERT J. HIGDON, JR.  
United States Attorney

BY:

  
BANUMATHI RANGARAJAN  
Senior Litigation Counsel  
Criminal Division